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June 19, 1987

Mr. John K. Thamm, General Manager Plateau Resources P.O. Box 511 Ticaboo, Utah 84532

Dear Mr. Thamm:

Re: Clarification of Reclamation Requirements, Tony M/Lucky Strike Mines, M/017/001, Garfield County, Utah

A summary of the requirements for final reclamation of the Tony M/Lucky Strike mine sites is given below as per your request. This summary is being provided for clarification and cost estimating purposes. It is recommended that Plateau Resources contact the Division and arrange a detailed reclamation plan review with our technical staff prior to major site reclamation work.

RECLAMATION REQUIREMENTS - TONY M/LUCKY STRIKE

1. Portals and Shafts

Portals and ventilation shafts will be sealed. Reclamation of portals is normally accomplished by blasting or backfilling (25 feet of backfill against a block wall). A bulkhead may be used to seal portals in those instances where blasting or backfilling is not practical. Shaft sealing is usually accomplished by backfilling or capping with a five foot concrete plug.

The Lucky Strike 10 portals were in use after the implementation of the Mined Land Reclamation Act (July 1, 1977) and should be sealed, as well as the portals that are in use at the Tony M site.

2. Waste Dumps

Waste rock dumps will be contoured to a natural draining configuration. The final slope angle, amount of topsoil (if any) to be placed atop the waste, seed and fertilizer application rates, etc., were to be determined by vegetative test plots (see Exhibit 1

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of Tony M/Lucky Strike Mine Amendment - October, 1980). The test plots have demonstrated that it is possible to revegetate the waste piles with transplanted stock using drip irrigation. The limited testing using broadcast seed with no soil cover was not successful.

The Division reclamation standards require that disturbed areas be revegetated to 70 percent of the original ground cover* (Rule M-10(12)). Plateau Resources committed to achieving all the Rule M-10 reclamation standards on an MR Form 8 which was signed by R.B. Sewell on June 4, 1979.

The Division <u>recommendation</u> for reclaiming the waste dumps and meeting the reclamation standards are:

- a. Grade the dumps to be self-draining with slopes of two horizontal to one vertical or less.
- b. Place two feet of suitable soil material over the waste.
- c. Scarify the top six inches of soil (with the contour).
- d. Drill or broadcast seed adaptable species at a rate of 20 pounds per acre.
- e. Add 200 pounds of fertilizer per acre.

This recommendation is conservative because the vegetative test plots have not shown that a less costly reclamation method will be successful.

Plateau Resources is fully responsible for the eventual reclamation of the Tony M waste dumps. The Division will not require you to reclaim the slopes of the Lucky Strike dumps. It is our understanding that most of this waste was prelaw and that Plateau Resources added very little to these dumps.

3. Buildings and Associated Facilities

Extraneous debris, unusable buildings, and scrap metal and wood will be removed from the location or buried. This includes the break up and burial of footings and foundations (we recommend burial at least three feet deep). It will not be necessary to remove a building if it has a post mining use that is approved by the Division.

*Our Soils Specialist, Frank Jensen, says that the original estimate for vegetative cover density of 20 percent that was submitted by R.B. Sewell in January, 1979, is too high and will have to reevaluated prior to evaluating reclamation success.

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4. Roads, Pads, Ponds, etc.

All disturbed surfaces will be regraded, stockpiled soil added, and seeded. This includes the roads and pad areas associated with both the Tony M and Lucky Strike 10 mines. Erosion control measures, such as water bars, should be implemented wherever necessary. Roads can be left unreclaimed if they have an approved continuing use. This usually requires a written statement by the county, landowner, or land regulating agency stating that they wish to keep the road, and will continue to maintain it.

The amended plan (received October, 1980) includes provisions for reclaiming the two evaporation ponds and associated borrow areas. The reclamation plan for these areas can be found on pages three through five of the amended plan.

5. Maintenance Procedures

Maintenance procedures for revegetation will be accomplished as necessary. The sites will be checked at least biannually by Plateau Resources personnel who will immediately augment any necessary steps in revegetation or erosion control. Critical sites and those not responding as projected will be checked more often.

The Mined Land Reclamation Contract between the Board of Oil, Gas and Mining and Plateau Resources for the Tony M/Lucky Strike mines is for an estimated \$140,637.58. The Division, if requested, will reevaluate the contract amount. This is usually done when reclamation occurs or when mine expansion is curtailed.

I hope that this brief overview of the permit adequately answers your questions. Frank Filas, of my staff, has scheduled a field trip in your area for the first week of August. He would be happy to meet onsite with you at that time and review the reclamation plan and answer any additional questions that you might have. Please contact Frank (Ph. 538-5264) if you desire such a meeting.

Sincerely,

Lowell P. Braxton

Samuel P Breeter

Administrator

Mineral Resource Development and Reclamation Program

clj

cc: F. Filas

F. Jensen

D. Wham

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